

Patricia A. Meyers
Route 4 Box 103A
Frankford, DE 19945

Dennis L. Smith
P.O. Box 311
Selbyville, De 19975

September 11, 2006

Civil Action No. 06-455-KAJ

United States District Court for the District of Delaware
Bogg'(s) Federal Bldg.,
844 N. King Street
Lockbox 18
Wilmington, DE 19801- 3517

John E. Tarburton, Attorney
Bar I.D. No. 3918
420 Pennsylvania Avenue, Suite 2
Seaford, Delaware 19973 - 3706
(Note: Another new address)
Certified Mail No. 7005 3110 0000 1602 7627

Ref: **Attorney, Tarburton's August 25, 2006, letter of deceit**, concerning Steven Krebs d/b/a Kreative Garden Center v. Patricia A. Meyers **Civil Action No. 06-455-KAJ**

Dearest Staff of your Honorable Honor and Attorney Tarburton:

First of all, for the record, **before** responding to Attorney Tarburton's referenced above letter, Attorney Tarburton need to understand the following below:

1. Concerning the Court of Chancery civil case No. 1120-S, Steven Krebs vs. Ms. Patricia A. Meyers, therefore, agent Mr. Dennis L. Smith signed for this lawsuit, but Ms. Meyers did not sign for her own lawsuit, which was under the control of the Court of Chancery in the past.
2. Concerning the United States District Court, for the District of Delawawre civil case No. 06-455-KAJ, Steven Krebs vs. Ms. Patricia A. Meyers, therefore, agent Mr. Dennis L. Smith signed the **civil cover sheet** dated July 27, 2006, for the " Notice of Removal, but Ms. Meyers did not sign this cover **civil cover sheet**.

NOTE: In summary, on July 27, 2006, **before** the U.S. District Court's clerk **allowed** agent Mr. Dennis L. Smith to sign this mentioned above cover sheet **and** file this mentioned above " Notice of Removal ", therefore this court's clerk **first of all**, did the following: Asked me (Agent Mr. Smith) to show proof of a Power of Attorney from Defendant, Ms. Patricia A Meyers, and agent Mr. Smith showed this requested proof. Then this court's clerk took this power of attorney to another department off this same office to **confer** with other staff of the court, and then returned and concluded that agent Mr. Smith may do as indicated in number # 2, mentioned above.

Continue on page # 2

Your Honorable Honor and Attorney Tarburton
 September 11, 2006
 Page # 2

3. On August 29, 2006, in a phone conversation with the Honorable Kent A. Jordan's secretary Ms. Sheryl, who **instructed** agent Mr. Smith that, **ANY conversations that you have with Mr. Tarburton, have to include Ms. Meyers**, you can not represent Ms. Meyers or her interest. Agent Mr. Smith made it clear that he was not representing Ms. Meyers or her interest. For the record I, (Agent Mr. Smith) am Ms. Meyers' **power of attorney / agent / emissary and witness** in this civil case No. 06-455-KAJ.

Response to Attorney Tarburton's August 25, 2006, letter below:

In this August 25, 2006, letter Attorney Tarburton **deceitfully** stated to Judge Kent A. Jordan, " I received a letter from you dated August 16, 2006, **directing me** to schedule a telephone conference with your secretary to discuss dates to be adopted in a Scheduling Order." ***Vs., the truth,*** Judge Kent A. Jordan's August 16, 2006, letter involves the following **CITIZENS OF THE UNITED STATES: Counsel** (Attorney Tarburton), **Ms. Meyers** and **Mr. Smith, and** clearly states to **all** three parties **equally**, " Please **confer** and **jointly call my secretary** within ten days of the date of this letter to schedule a telephone conference to discuss dates you recommend be adopted in the Order."

Attorney Tarburton's second paragraph of his **deceitful** August 25, 2006, letter was design to deceive (Trick) Judge Kent A. Jordan into believing his lie **as quoted**, " ... I **don't believe** that I should participate in a scheduling conference where he purports to represent the interest of Patricia A. Meyers." Also, Attorney Tarburton do not believe and/or care about the Honorable Kent A. Jordan's secretary Ms. Sheryl, **directing me** (Agent Mr. Smith) that, **ANY conversations that you have with Mr. Tarburton, have to include Ms. Meyers**, you can not represent Ms. Meyers or her interest. -----
Attorney Tarburton and Chancellor William B. Chandler III, both clearly know of the AMENDED VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, which was E-filed on **January 19, 2006**, and also designed to "**... strike the appearance of Dennis L. Smith, who is not a member of the Delaware Bar,..**" This quote was Attorney Tarburton's **racist and incorrect claim**, but **see, all enclosed Exhibits, which are after the date January 19, 2006, which will prove that Attorney Tarburton *willingly* had conversations with agent Mr. Smith only, and did not request to include Ms. Meyers: See Exhibit A, B, C, D, E and F below:**

Your Honorable Honor and Attorney Tarburton
September 11, 2006
Page # 3

Exhibit A, cassette tape --After January 19, 2006, Attorney Tarburton willfully had a conversation with agent Mr. Smith which did not include defendant, Ms. Meyers. (Date of this conversation is **June 22, 2006.**)

Exhibit B, cassette tape -- After January 19, 2006, Attorney Tarburton willfully had a conversation with agent Mr. Smith which did not include defendant, Ms. Meyers. (Date of this conversation is **June 26, 2006.**) – **Attorney Tarburton called agent Mr. Smith.**

Exhibit C, cassette tape --After January 19, 2006, Attorney Tarburton willfully had a conversation with agent Mr. Smith which did not include defendant, Ms. Meyers. (Date of this conversation is around or about **July 1, 2006.**) – **Attorney Tarburton is an officer of the court who requested to come to agent Mr. Smith home to discuss his (Attorney Tarburton's) June 8, 2006, letter.**

Exhibit D, cassette tape --After January 19, 2006, Attorney Tarburton **only in this case, did not want to have a conversation with agent Mr. Smith, any more.** (Date of this conversation is **August 22, 2006.**) – **Concerning the Honorable Kent Jordan's August 16, 2006, letter, therefore Attorney Tarburton promised to contact me (Agent Smith) before the deadline, which is within the ten days indicated, but Attorney Tarburton an officer of the court lied.**

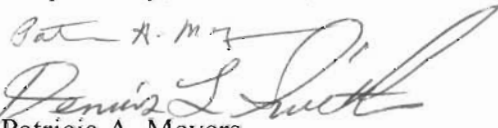
Your Honorable Honor and Attorney Tarburton
September 11, 2006
Page # 4

Furthermore, see **Exhibit E**, which is the Court of Chancery's docket sheet for civil case No. 1120-S. Therefore, use the sequence of black bold numbers on the docket sheet to locate the correct location for each attached e-filed document, which will have a black bold matching number. These e-filed documents also confirms the fact that agent Mr. Smith was allow to act as power of attorney / agent / emissary and witness for defendant Ms. Patricia A. Meyers. The racial issue became worse, after Ms. Meyers' July 8, 2006, letter concerning Actionable Negligence and/or Conspiracy was e-filed. Only then I, (Agent Mr. Smith) was attacked. Also, keep in mind, starting from 2 / 23 / 2005, through to January of 2006, agent Mr. Smith worked properly with Mr. Krebs prior Attorney Alan G. Davis.

Conclusion, based on all fact mentioned above, clearly Attorney Tarburton in his own deceitful letter dated August 25, 2006, chose not to follow the Honorable Kent A. Jordan's instruction in his letter dated August 16, 2006.

Everyone, please read Ms. Meyers' July 8, 2006, letter concerning Actionable Negligence and/or Conspiracy, which involves both, Chancellor William B. Chandler III and Attorney Tarburton, and then for the first time, we will understand the truth, why Chancellor William B. Chandler III is trying to cover -up for Attorney Tarburton. Attorney Tarburton's letter dated August 25, 2006, is enclosed as Exhibit F, **with** the attached Chancellor William B. Chandler III court ordered dated **July 18, 2006. (NOTE: Racism only after Ms. Meyers' July 8, 2006, letter.** See the Court of Chancery's own docket sheet concerning the sequence of this civil case No. 1120-S.

Respectfully, Submitted,


Patricia A. Meyers
Dennis L. Smith

Cc: The Honorable Judge, Kent A. Jordan
The Honorable Chief Judge, Sue L. Robinson
Mr. Steven S. Krebs - Certified Mail No. 7005 3110 0000 1602 7719

Enclosed: Exhibits A, B, C, D, E and F

Exhibit

E

LexisNexis® File & Serve

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DE Court of Chancery[Resource Center](#) [Preferences](#) [Sign Off](#)[Home](#)[Filing & Service](#)[Alerts](#)[Search](#)[Case History](#)[Cases Search](#)[Daily Docket](#)[Transaction Status](#)[Advanced Search](#)[Home](#) > [Select Case](#) > [Case History](#)**Case History Search**Search Created:
Thursday, August 31, 2006 15:43:20
EDT[Printable Version](#)

Court: DE Court of Chancery **Judge:** Chandler, William B **File & Serve Live Date:** 2/23/2005

Division: N/A **Case Number:** 1120-S **Document(s) Filed:** 55

Case Type: Injunctive Relief **Case Name:** Krebs, Steven et al vs Patricia A Meyers **Date Range:** All

Choose an action: -- Select --

Show 1000 records

1-29 of 29 transactions << Prev Page 1 of 1 Next >>

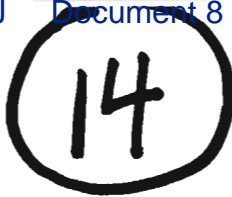
<input type="checkbox"/>	Transaction	Date/Time	Option	Case Number Case Name	Authorizer Organization	<input type="checkbox"/>	#	Document Type	Document Title	Size
29	12216946	8/29/2006 3:34 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	William B Chandler, DE Court of Chancery	<input type="checkbox"/>	39	Scheduling Order	Scheduling Order [view]	0.1MB
28	12216885	8/29/2006 3:31 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	William B Chandler, DE Court of Chancery	<input type="checkbox"/>	38	Letter Decision	Letter Decision [view]	0.1MB
27	11931138	7/31/2006 11:47 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia G Randolph, DE Court of Chancery	<input type="checkbox"/>	37	Other	Copy of Petition sent to The District Court filed by Patricia A. Meyers and Dennis Smith [view]	1.7MB
						<input type="checkbox"/>		Exhibits	Exhibits [view]	7.6MB
						<input type="checkbox"/>		Exhibits	Exhibits [view]	9.5MB
26	11827270	7/18/2006 2:56 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	William B Chandler, DE Court of Chancery	<input type="checkbox"/>	36	Letter	Letter [view]	0.1MB
25	11786496	7/13/2006 3:00 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia G Randolph, DE Court of Chancery	<input type="checkbox"/>	35	Letter	Letter to Chancellor Chandler and John Tarburton from Dennis Smith dated July 6 2006 [view]	3.3MB
24	11662326	6/29/2006 9:37 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	John E Tarburton, Procino- Wells, Michele	<input type="checkbox"/>	34	Letter	John Tarburton, Esquire's letter in response to Dennis Smith's June 25, 2006 letter [view]	0.1MB
23	11642197	6/27/2006 1:51 PM EDT	File And	1120-S Krebs, Steven	William B Chandler,	<input type="checkbox"/>	33	Letter	Letter [view]	0.1MB

False date

			Serve	et al vs	DE Court of				
				Patricia A	Chancery				
22	11638288	6/27/2006 10:49 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	John E Tarburton, Procino- Wells, Michele	<input type="checkbox"/>	32 Letter	Letter from John E. Tarburton, Esquire requesting continuance to file answering brief [view]	0.1MB
21	11637057	6/27/2006 8:11 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia G Randolph, DE Court of Chancery	<input type="checkbox"/>	31 Letter	Letter to Chancellor Chandler & Mr. Tarburton from Dennis Smith dated June 25, 2006 requesting an extension of hearing [view]	2.9MB
20	11583055	6/20/2006 4:02 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	William B Chandler, DE Court of Chancery	<input type="checkbox"/>	30 Letter	Scheduling Letter [view]	0.1MB
19	11554598	6/16/2006 2:39 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia G Randolph, DE Court of Chancery	<input type="checkbox"/>	27 Letter	Letter to Mr. Tarburton and Chancellor Chandler dated June 12 2006 [view]	1.5MB
						<input type="checkbox"/>	28 Brief	Plaintiff's Answering Brief To Defendant's Motion To Dismiss [view]	2.4MB
						<input type="checkbox"/>	29 Appendix	Appendix To Plaintiff's Answering Brief To Defendant's Motion To Dismiss [view]	0.3MB
						<input type="checkbox"/>	Other	Attachments to Plaintiff's Answering Brief [view]	4.4MB
						<input type="checkbox"/>	Certificate of Service	Certificate Of Service [view]	0.1MB
						<input type="checkbox"/>	Other	Attachments To Appendix To Plaintiff's Answering Brief To Defendant's Motion To Dismiss [view]	3.3MB
18	11490359	6/9/2006 12:17 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	William B Chandler, DE Court of Chancery	<input type="checkbox"/>	26 Letter	Letter Revising Briefing Schedule [view]	0.1MB
17	11380553	5/26/2006 8:51 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	William B Chandler, DE Court of Chancery	<input type="checkbox"/>	25 Letter	Letter [view]	0.1MB
16	10640628	2/23/2006 8:48 AM EST	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia G Randolph, DE Court of Chancery	<input type="checkbox"/>	24 Motion	Corrected Page 6 in the Motion To Dismiss Plaintiffs Amended Verified Complaint for Declaratory and Injunctive Relief [view]	0.1MB
15	10551029	2/10/2006	File	1120-S	Patricia G		23 Motion	Motion To Dismiss	0.4MB

		3:53 PM EST	And Serve	Krebs, Steven et al vs Patricia A Meyers	Randolph, DE Court of Chancery	<input type="checkbox"/>		Plaintiff's Amended Verified Complaint For Declaratory And Injunctive Relief filed by Dennis Smith [view]	
						<input type="checkbox"/>	Proposed Order	Order [view]	0.1MB
						<input type="checkbox"/>	Exhibits	Exhibits [view]	0.5MB
14	10366417	1/19/2006 10:39 AM EST	File Only	1120-S Krebs, Steven et al vs Patricia A Meyers	Michele Procino-Wells, Procino-Wells, Michele	<input type="checkbox"/>	17 Proposed Order	Notice of Motion, Motion to File Amended Complaint and Order [view]	0.1MB
						<input type="checkbox"/>	18 Exhibits	Exhibit to Motion [view]	0.1MB
						<input type="checkbox"/>	19 Exhibits	Exhibit to Motion [view]	0.1MB
						<input type="checkbox"/>	20 Exhibits	Exhibit to Motion [view]	0.1MB
						<input type="checkbox"/>	21 Exhibits	Exhibit to Motion [view]	0.1MB
						<input type="checkbox"/>	22 Exhibits	Exhibit to Motion [view]	0.1MB
13	6482620	8/15/2005 9:48 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	16 Order	Stipulation To Substitute Counsel [view]	0.1MB
12	5991046	6/10/2005 12:09 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	15 Letter	Letter from Mr. Smith dated June 7, 2005 [view]	0.2MB
11	5854388	5/19/2005 4:09 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	11 Amended Answer	Amended Answer filed by Mr. Smith [view]	0.4MB
						<input type="checkbox"/>	12 Exhibits	Amended Answer Exhibit A [view]	0.9MB
						<input type="checkbox"/>	13 Exhibits	Amended Answer Exhibit B-F [view]	0.3MB
						<input type="checkbox"/>	14 Exhibits	Amended Answer Exhibits G-J [view]	0.1MB
10	5760839	5/5/2005 4:35 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	10 Letter	Letter from Mr. Smith Ref: Amended Answer [view]	0.1MB
9	5722176	4/29/2005 4:14 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	9 Other	Answer To Complaint For Declaratory and Injunctive Relief [view]	0.3MB
						<input type="checkbox"/>	Exhibits	Exhibit A to Answer [view]	0.8MB
						<input type="checkbox"/>	Exhibits	Exhibit B-G Answer [view]	0.4MB
8	5660122	4/21/2005 9:17 AM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	8 Letter	Letter from Mr. Smith and Ms. Myers [view]	0.2MB

7	5608091	4/13/2005 3:00 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	7	Letter	Letter from Dennis Smith and Patricia Meyers [view]	0.1MB
	5550662	4/4/2005 5:00 PM EDT	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia Randolph, DE Court of Chancery	<input type="checkbox"/>	6	Sheriffs Return	Service was completed on Patricia A. Meyers by Dennis Smith picking up her papers at the Sheriff's office [view]	0.1MB
	5469466	3/30/2005 5:00 PM EST	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia Randolph, DE Court of Chancery	<input type="checkbox"/>	4	Letter	Letter to Chancellor William B. Chandler, III and Alan G. Davis, Esq. from Dennis L. Smith [view]	0.1MB
	5469467	3/30/2005 5:00 PM EST	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Patricia Randolph, DE Court of Chancery	<input type="checkbox"/>	5	Letter	Letter with Date Correction to Mr. Davis and Chancellor Chandler from Dennis L. Smith and Patricia A. Meyers [view]	0.1MB
	5250045	3/1/2005 5:00 PM EST	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Arline Simmons, DE Court of Chancery	<input type="checkbox"/>	3	Other	Sent Summons To Sheriff 3/1/05 [view]	0.1MB
2	5203826	2/23/2005 4:06 PM EST	File And Serve	1120-S Krebs, Steven et al vs Patricia A Meyers	Alan G Davis, Davis, Henry Clay III PA	<input type="checkbox"/>	2	Praecipe	Praecipe [view] • Linked to (1)	0.1MB
						<input type="checkbox"/>		Affidavit	Affidavit of Steven Krebs [view] • Linked to (1)	0.1MB
						<input type="checkbox"/>		Exhibits	Exhibit A: Commercial Lease Agreement [view] • Linked to (1)	0.2MB
						<input type="checkbox"/>		Exhibits	Exhibit B: Letter to Defendant [view] • Linked to (1)	0.1MB
						<input type="checkbox"/>		Exhibits	Exhibit C: Letter from Dennis L. Smith [view] • Linked to (1)	0.1MB
1	5199838	2/23/2005 10:08 AM EST	File Only	1120-S Krebs, Steven et al vs Patricia A Meyers	Alan G Davis, Davis, Henry Clay III PA	<input type="checkbox"/>	1	Complaint	Verified Complaint for Declaratory and Injunctive Relief [view] • Linked from (5)	0.1MB
						<input type="checkbox"/>		Case Information Statement	Supplemental Information Pursuant to Rule 3(a) of the Rules of the Court of Chancery [view]	0.1MB
						<input type="checkbox"/>		Proposed Order	Proposed Order [view]	0.1MB
						<input type="checkbox"/>		Proposed Order	Order [view]	0.1MB



EFiled: Jan 19 2006 10:39AM EST
Transaction ID 10366417



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN AND FOR SUSSEX COUNTY

STEVEN KREBS d/b/a	:	C.A. No. 1120-S
KREATIVE GARDEN CENTER,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
PATRICIA A. MEYERS[,] AND	:	
<u>DENNIS L. SMITH,</u>	:	
	:	
Defendant[.]s.	:	

**AMENDED VERIFIED COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

This is an action for declaratory and injunction relief. Plaintiff seeks a determination from this Court that a lease executed by Patricia A. Meyers is a binding, enforceable contract entitling Plaintiff to the quiet enjoyment of the leased premises, and that the provisions regarding the contract extension have been adequately complied with. Plaintiff further seeks injunctive relief against Defendant to prevent her or her agents from continued interference with Plaintiff's rights under the lease. In this action, Plaintiff seeks to strike the appearance of Dennis L. Smith, who is not a member of the Delaware Bar, and to add Dennis L. Smith as a Defendant. In support of its claims, Plaintiff alleges as follows:

1. Plaintiff, Steven Krebs d/b/a Kreative Garden Center (hereinafter "Kreative") is a resident of the State of Delaware.

15

EFiled: Feb 10 2006 3:53PM
Transaction ID 10551029

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN AND FOR SUSSEX COUNTY

STEVEN KREBS, d/b/a, KREATIVE
GARDEN CENTER,

C.A. No.: 1120 - S

Plaintiff,

v.

PATRICIA A. MEYERS[,] AND
DENNIS L. SMITH,

Defendant[s].

MOTION TO DISMISS PLAINTIFF'S AMENDED VERIFIED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF
 REGISTER IN CHANCERY
 GEORGETOWN, DELAWARE
 2006 FEB 10 P 3:52

COMES NOW the Defendant, Ms. Patricia A. Meyers, (hereinafter " Meyers ") who is pro se, of RR 4, Box 103A, Frankford, Delaware 19945, by and through her attorney-in-fact/agent, Dennis L. Smith (hereinafter " Smith ") who is also pro se, and a witness. This is an action to dismiss Plaintiff's action for declaratory and injunction relief. Meyers seeks a determination from this Court that a lease executed by Kreative is not binding because this lease is a moot issue now, therefore not a enforceable contract entitling Plaintiff to the quiet enjoyment of the leased premises, and that the provisions regarding the contract extension is deceitful, unconscionable, ambiguous, poorly written and moot, because this lease terminated on March 28, 2005. Plaintiff stated, "... further seeks injunctive relief against defendant to prevent her or her agents from continued interference with plaintiff's rights under the lease. In this action, Plaintiff seeks to strike the appearance of Dennis L. Smith, who is not a member of the Delaware Bar, and to add

16

EFiled: Feb 23 2006 8:48AM EST
Transaction ID 10640628



Dennis L. Smith
P. O. Box 311
Selbyville, DE 19975

January 22, 2006

CA 1120-S

Hand Delivered To: Mr. John E. Tarburton's office and to Chancellor William B. Chandler III,
Of the Court of Chancery's office (This letter -- 1 pages and a corrected copy of
page # 6.

To: John E. Tarburton, Attorney
Procino & Tarburton LLP
123 Pennsylvania Avenue
Seaford Delaware 19973

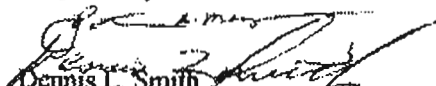
To: Chancellor William B. Chandler III
Court of Chancery
P. O. Box 581
Georgetown, Delaware 19947

Re: A corrected page # 6, this page # 6, is a correction of agent's letter dated January 19, 2006, to
Attorney John E. Tarburton. This letter is enclosed in the Motion to DISMISS Plaintiff's Amended
Verified Complaint for Declaratory and Injunctive Relief dated February 9, 2006, concerning civil
case # 1120-S. Steven Krebs, d/b/a Kreative Garden Center -v- Patricia A. Meyers through her
attorney-in-fact / agent / witness (Mr. Dennis L. Smith, who has a power of attorney for the leased
2.5 acres issues.

Dear Mr. Tarburton and Chancellor William B. Chandler III:

Please find enclosed a copy of a corrected page # 6, to this January 19, 2006, letter as above mentioned.
Thank you.

Respectfully submitted,


Dennis L. Smith
Patricia A. Meyers

cc: Mr. Steven Scott Krebs, by certified Mail, 7002 0460 0001 5100 2774, this courtesy copy
includes only page # 6. (This act was authorized)

Enclosed: Page # 6.

REGISTER IN CHANCERY
GEORGETOWN, DELAWARE
2006 FEB 22 P 4:15

20

EFiled: Jun 20 2006 4:02PM EDT
Transaction ID 11583055



WILLIAM B. CHANDLER III
CHANCELLOR

COURT OF CHANCERY
OF THE
STATE OF DELAWARE

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

June 20, 2006

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, DE 19973

Dennis L. Smith
P.O. Box 311
Selbyville, DE 19975

Patricia A. Meyers
RR 4, Box 103A
Frankford, DE 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

Dear Counsel, Ms. Meyers and Mr. Smith:

Pending in this matter is defendant's motion to dismiss. Oral argument in this matter shall be held on Friday, June 30, 2006 at 9:30 a.m. in the Court of Chancery, Georgetown, Delaware. In addition, I intend to use the scheduled oral argument as a form of pre-trial conference to discuss scheduling and other procedural matters in this case.

Please mark your calendars and be present on Friday, June 30, 2006 at 9:30 a.m.

IT IS SO ORDERED.

Very truly yours,

A handwritten signature in cursive script that reads "William B. Chandler III".

William B. Chandler III

WBCIII:meg

xc: Marsha Alfree
Arline Simmons
Court Reporters

21

EFiled: Jun 27 2006 8:11AM EBT
Transaction ID 11637057



Dennis L. Smith
P.O. Box 311
Selbyville, De 19975

June 25, 2006

Chancellor William B. Chandler, III
Court of Chancery
34 The Circle
Georgetown, DE 19947

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, DE 19973

REGISTER IN CHANCERY
2006 JUN 26 P 3:59

Ref: Steven Krebs d/b/a Kreative Garden Center v. Patricia A. Meyers Civil Action No. 1120-S
Concerning facts and a **REQUEST FOR AN EXTENTION**

Dear Chancellor Chandler III and Attorney Tarburton:

First of all, so Plaintiff's civil action 1120-S does not get dismissed by Defendant's request under Rule 41. (b), as a result, Attorney John E. Tarburton as a professional and a officer of the Court designed a letter dated June 8, 2006, to deceived the Court into believing that he did not have AMPLE time SINCE February 10, 2006, to answer Defendant's motion to dismiss. Furthermore, in this letter, Attorney Tarburton wants to blame the Court's Order dated May 26, 2006, for not having ample time to answer, and Attorney Tarburton did not tell the TRUTH when he stated, "I have been unable to contact Ms. Meyers about this request..." concerning an **EXTENSION**. Therefore, the Court was deceived. This prejudice act is a violation of professional conduct Rule 8.4, and this letter, also was not efiled on **June 9, 2006**, the day of **ruling** and violates Rule 79.1: and Administrative Directive of the Chancellor of the Court of Chancery of the State of Delaware. Based on the fact Defendant was not **allowed any time** to respond to Attorney Tarburton's June 8, 2006, letter of deceit, therefore, Chancellor William B. Chandler, III secretary Ms. Mary-ellen Greenly gave Ms. Meyers' agent until June 16, 2006, to respond to Attorney Tarburton's letter dated June 8, 2006. **See some of the Evidences listed below, which will prove that Attorney Tarburton's letter dated June 8, 2006, was deceitful to the Court and prejudice to Defendant Ms. Meyers:**

1. Evidence - Defendant's letter dated June 12, 2006, which was efiled on June 16, 2006, as allowed. _____ Exhibit D
2. Evidence - **Ample Time issue** - Chancellor William B. Chandler III Order dated May 26, 2006, states, "On **February 10, 2006**, defendant filed a speaking motion to dismiss the complaint. As of today, no answering brief has been filed." _____ Exhibit E
3. Evidence - Attorney Tarburton's **deceitful letter dated June 8, 2006**, which was not efiled on **June 9, 2006**, the day of ruling. Also, in this deceitful letter Attorney Tarburton did not tell the TRUTH when he stated, "**I have been unable to contact Ms. Meyers about this request...**" - Exhibit F

Continue on page # 2

23

EFiled: Jun 27 2006 1:51PM EDT
Transaction ID 11642197



WILLIAM B. CHANDLER III
CHANCELLOR

**COURT OF CHANCERY
OF THE
STATE OF DELAWARE**

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

June 27, 2006

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, DE 19973

Dennis L. Smith
P.O. Box 311
Selbyville, DE 19975

Patricia A. Meyers
RR 4, Box 103A
Frankford, DE 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

Dear Counsel, Ms. Meyers and Mr. Smith:

In response to Mr. Smith's unopposed request, in the above-captioned case, in which he asks for an extension to file his reply brief, I have extended the date to file his reply brief to July 28, 2006. The hearing on June 30, 2006, is cancelled and will not be rescheduled as I intend to decide the motion to dismiss on the briefs.

IT IS SO ORDERED.

Very truly yours,

A handwritten signature in cursive script that reads "William B. Chandler III". The signature is written in dark ink and is positioned above the printed name.

William B. Chandler III

WBCIII:meg

xc: Marsha Alfree
Arline Simmons
Court Reporters

24

EFiled: Jun 29 2006 9:37AM EDT
Transaction ID 11662326



June 27, 2006

Via facsimile and first class mail

Chancellor William B. Chandler, III
Court of Chancery
34 The Circle
Georgetown, Delaware 19947

**Re: Steven Krebs d/b/a/ Kreative Gardens Center v.
Patricia A. Meyers; C.A. No. 1120-S
Defendant's request for continuance**

Dear Chancellor Chandler:

Mr. Smith contacted me on Friday, June 23, 2006, and requested a continuance for the hearing scheduled for June 30, 2006. The reason he gave was that his wife had a medical problem which would preclude him from attending. I called Mr. Smith on Monday, June 26, 2006, and told him that I had no objection to his request. The remaining assertions contained in his letter request of June 23, 2006 (and attachments) regarding any attempt by me to deceive the Court, Mr. Smith, Ms. Meyers or anyone else are denied. Apparently, my letter request for a continuance dated June 8, 2006 was not e-filed until today. I apologize for this oversight and any inconvenience it may have caused.

Please contact me if you have any questions.

Sincerely,

/s/John E. Tarburton
John E. Tarburton (I.D. No. 3918)

JET/lkf

pc: Dennis Smith
Patricia Meyers

25

EFiled: Jul 13 2006 3:00PM EDT
Transaction ID 11786496



Dennis L. Smith
P.O. Box 311
Selbyville, De 19975

July 8, 2006

Chancellor William B. Chandler, III
Court of Chancery
34 The Circle
Georgetown, DE 19947

John E. Tarburton, *Attorney*
303 North Shipley Street
Seaford, DE 19973

Certified Mail No. 7002 9460 0001 5100 2767 - *Two True Copies*

Ref: Steven Krebs d/b/a Kreative Garden Center v. Patricia A. Meyers Civil Action No. 1120-S concerning a response to **Attorney Tarburton's letter dated June 27, 2006**, and to **Chancellor Chandler III's letter of ruling, which is also dated June 27, 2006**. Also, again concerning Chancellor Chandler III's letter of ruling dated **June 9, 2006**.

Dear Chancellor Chandler III and Attorney Tarburton:

First of all, for the record, this letter is a response letter to Attorney Tarburton's letter dated June 27, 2006. Attorney Tarburton confirmed that it took him approximately three (3) days to respond to agent's June 23, 2006, verbal request, ~~to his~~ at that time. Also, concerning agent's wife, this was a serious medical issue, later agent found that defendant Ms. Meyers and her son had medical issues around this same time, see my letter dated June 25, 2006, and see all four paragraphs below concerning Attorney Tarburton's June 27, 2006, letter. — See Exhibit — G

Attorney Tarburton stated, "The remaining assertions contained in his letter request of June 23, 2006 (and attachments) regarding any attempt by me to deceive the Court, Mr. Smith, Ms. Meyers or anyone else are denied." Therefore, the fact is, agent never sent Attorney Tarburton a letter dated June 23, 2006, but if this same quote was concerning agent's June 25, 2006, letter, than Attorney Tarburton's quote would be false and deceitful.

Attorney Tarburton stated, "Apparently, my letter request for a continuance dated **June 8, 2006** was not e-filed until today." Therefore, as a witness Attorney Tarburton confirms the fact, that on June 9, 2006, Chancellor Chandler III illegally ruled on his June 8, 2006, letter which was not legally a part of civil case No. 1120-S, record and while in violation of Rule 79.1, and Administrative Directive of the Chancellor of the Court of Chancery of the State of Delaware.

After this paragraph just mentioned above, after Chancellor Chandler III's secretary Ms. Mary-ellen Greenly told agent Smith on June 12, 2006, that she is going to have to call Procino & Tarburton's office AGAIN and tell Attorney Tarburton to **e-file his June 8, 2006, letter** or we **will not even consider his letters**, after agent Mr. Smith's letter dated June 12, 2006, which was signed for and after agent Mr. Smith's letter dated June 25, 2006, which was also signed for. Therefore, all information just mentioned involved Attorney Tarburton's June 8, 2006, letter not being e-filed, for one issue, BUT, in Attorney Tarburton's June 27, 2006, letter, he stated, "I **apologize** for this **oversight**"

Continue on page # 2

Dennis L. Smith
P.O. Box 311
Selbyville, De 19975

July 8, 2006

Chancellor William B. Chandler, III
Court of Chancery
34 The Circle
Georgetown, DE 19947

John E. Tarburton, *Attorney*
303 North Shipley Street
Seaford, DE 19973

Certified Mail No. 7002 9460 0001 5100 2767 - *Two True Copies*

*Notice: Because of Attorney
Tarburton's June 8, 2006, deceitful
letter, Attorney Procino confirmed
that she "parted way"
see page #2 for details*

2006 JUL 13 P 2 02

REGISTER IN CHANCERY
COURT OF CHANCERY
GEORGETOWN, DE 19947

Ref: Steven Krebs d/b/a Kreative Garden Center v. Patricia A. Meyers Civil Action No. 1120-S concerning a response to **Attorney Tarburton's letter dated June 27, 2006**, and to **Chancellor Chandler III's letter of ruling, which is also dated June 27, 2006**. Also, again concerning Chancellor Chandler III's letter of ruling dated **June 9, 2006**.

Dear Chancellor Chandler III and Attorney Tarburton:

First of all, for the record, this letter is a response letter to Attorney Tarburton's letter dated June 27, 2006. Attorney Tarburton confirmed that it took him approximately three (3) days to respond to agent's June 23, 2006, **verbal** request, ~~to his~~ at that time. Also, concerning agent's wife, this was a serious medical issue, later agent found that defendant Ms. Meyers and her son had medical issues around this same time, see my letter dated June 25, 2006, and see all four paragraphs below concerning Attorney Tarburton's June 27, 2006, letter. ---- **See Exhibit -- G**

Attorney Tarburton stated, "The remaining assertions contained in his letter request of June 23, 2006 (and attachments) regarding any attempt by me to deceive the Court, Mr. Smith, Ms. Meyers or anyone else are denied." Therefore, the fact is, agent never sent Attorney Tarburton a letter dated June 23, 2006, but **if** this same quote was concerning agent's June 25, 2006, letter, than Attorney Tarburton's quote would be **false** and **deceitful**.

Attorney Tarburton stated, "Apparently, my letter request for a continuance dated **June 8, 2006** **was not e-filed until today**." Therefore, as a witness Attorney Tarburton confirms the fact, that on June 9, 2006, Chancellor Chandler III illegally ruled on his June 8, 2006, letter which was not legally a part of civil case No. 1120-S, record and while in violation of Rule 79.1, and Administrative Directive of the **Chancellor of the Court of Chancery of the State of Delaware**.

After this paragraph just mentioned above, after Chancellor Chandler III's secretary Ms. Mary-ellen Greenly told agent Smith on June 12, 2006, that she is going to have to call Procino & Tarburton's office **AGAIN** and tell Attorney Tarburton to **e-file his June 8, 2006, letter** or we **will not even consider his letters**, after agent Mr. Smith's letter dated June 12, 2006, which was signed for and after agent Mr. Smith's letter dated June 25, 2006, which was also signed for. Therefore, all information just mentioned involved Attorney Tarburton's June 8, 2006, letter not being e-filed, for one issue, **BUT**, in Attorney Tarburton's June 27, 2006, letter, he stated, "I **apologize** for this **oversight**"

Continue on page # 2

Chancellor Chandler III and Attorney Tarburton
July 8, 2006
Page # 2

and any inconvenience it may have caused.” For the RECORD, defendant Ms. Meyers **does not accept this deceitful apology**, which is design to deceitful allow Attorney Tarburton to get his foot in the door of the “ briefs ” issue and cover-up Chancellor Chandler III’s illegal ruling concerning Attorney Tarburton’s June 8, 2006, letter. ----- **See Exhibit G**

Furthermore, on July 5, 2006, agent (Mr. Smith) called to the office of Procino & Tarburton, LLP and found that **managing partner**, Attorney Procino **parted ways** from Attorney Tarburton on Friday, June 30, 2006, for the following reasons listed below:

1. In this phone conversation on July 5, 2006, concerning Attorney Tarburton wrongful conduct, agent (Mr. Smith), stated, “... for him being an attorney, to disrespect ah, court **rule 79.1, of e-filing** which he played a trick in his **June 8, 2006**, letter on us, and he got caught in it, and that is really disturbing you know, because he is an officer of the court at the same time.” (Managing partner, Attorney Procino) stated, “ Oh, I, I **ABSOLUTELY understand THAT**, and you know without, going into to much detail ah, you know I, I hope that you will understand **why** he and I have now parted ways.” (Mr. Smith), stated, “ Oh, I understand.” ----- **See Exhibit H**
2. (Managing partner, Attorney Procino) stated, “... to file a complaint against him, is with the office of Disciplinary Counsel...” (Mr. Smith) stated, “... I am not after your office, I just, please do not misunderstand.” (Managing partner, Attorney Procino) stated, “ Oh no, and its, and its just, its just I hope you understand that’s **very frustrating for us**, you know now that, you know that, **because** you are not the **only call that we are receiving**...”
3. (Mr. Smith) stated, “ As you said, you know, he have been doing other, you have been getting other calls in regards to problems.” (Managing partner, Attorney Procino) stated, “ **uh-uh** ”

Based on the facts mentioned above, it is a **shame** that Chancellor Chandler III did not act as Attorney Procino. A federal investigation many be needed.

Conclusion -Ms. Meyers does not accept Attorney Tarburton’s deceitful apology in his June 27, 2006, letter.

Chancellor Chandler III and Attorney Tarburton
July 8, 2006
Page # 3

Response to Chancellor Chandler III's letter of ruling order, which is also dated June 27, 2006, and, again concerning Chancellor Chandler III's letter of ruling order dated June 9, 2006, and June 20, 2006.

A pattern of, Actionable **Negligence and/or Conspiracy**, involving Attorney John E. Tarburton and Chancellor William B. Chandler III, based on the facts below:

1. In Chancellor Chandler III's court order dated **May 26, 2006**, he stated, "On **February 10, 2006**, defendant filed a **speaking motion to dismiss** the complaint. As of today, no answering brief has been filed." Also, Chancellor Chandler III stated, "Plaintiff shall file an answering brief by **June 9, 2006**." **Plaintiff's** Attorney secretary **Ms. Lisa Fleetwood**, signed a receipt dated "2 / 10 / 06" for the "**motion to dismiss**". This means that Attorney Tarburton **also knew** that he had since February 10, 2006, to answer defendant's "**motion to dismiss**" and knew of the court's Rule 41.(b). Therefore, Attorney Tarburton written a deceitful letter to Chancellor Chandler III and Ms. Meyers dated **June 8, 2006**, requesting an **EXTENSION based on deceit**, this letter was designed to stop Ms. Meyers from **rightfully** requesting a dismissal of civil case No. 1120-S. In this deceitful letter dated June 8, 2006, Attorney Tarburton did not tell the truth when he stated, "**I have been unable to contact Ms. Meyers about this request,...**" This quote of Attorney Tarburton's is not true, because **he did contact** Ms. Meyers on or about June 9, 2006, with his June 8, 2006, letter and had ample time in the past to contact Ms. Meyers the SAME WAY with his first time letter of request." *Furthermore, any professional reasonable man know that a reasonable time span of days is needed for a letter response, but, Chancellor Chandler illegally helped Attorney Tarburton by not allowing Ms. Meyers any time to respond to Attorney Tarburton's June 8, 2006, letter of deceit.* Attorney Tarburton's request for an EXTENSION in his June 8, 2006, letter was based on deceit, which is a violation of Professional Conduct Rule 8.4. (a) (b) (c) (d) (e) (f) . **These wrongful acts**, which involves Attorney Tarburton and Chancellor Chandler III is prejudice, unfair and an injustice to Ms. Meyers and a violation of her FOURTEETH AMENDMENT CONSTITUTION RIGHTS / **EQUAL PROTECTION OF THE LAWS**. Attorney Tarburton is an **OFFICER** of the COURT. —This paragraph contains information, ~~in the~~ favors Attorney Tarburton.
2. In the court's order dated June 9, 2006, Chancellor Chandler III, helped Attorney Tarburton by illegally ruling in the favor of Attorney Tarburton's June 8, 2006, letter of deceit, concerning a requested extension. This deceitful letter was not **e-filed** at the time of Chancellor Chandler III's ruling; therefore, this wrongful act is a violation of Rule 79.1, and Administrative Directive of the Chancellor of the Court of Chancery of the State of Delaware. Attorney Tarburton also confirmed this violation in his letter, **which is also dated June 27, 2006**. **These wrongful acts**, which involves Attorney Tarburton and Chancellor Chandler III is prejudice, unfair and an injustice to Ms. Meyers and a violation of her FOURTEETH AMENDMENT CONSTITUTION RIGHTS / **EQUAL PROTECTION OF THE LAWS**. Attorney Tarburton is an **OFFICER** of the COURT.—This paragraph contains information, ~~in the~~ favors Attorney Tarburton.

Continue on page # 4

Chancellor Chandler III and Attorney Tarburton
 July 8, 2006
 Page # 4

3. After, Ms. Meyers' agent's letter dated June 12, 2006, to Chancellor Chandler III and to Attorney Tarburton, Chancellor Chandler III made a new court order dated **June 20, 2006**. In this new court order Chancellor Chandler III stated, " Pending in this matter is **defendant's motion to dismiss**. **Oral argument** in this matter shall be held on Friday, June 30, 2006 at 9:30 a.m. in the Court of Chancery, Georgetown, Delaware." Therefore, because of illness issues, Ms. Meyers' agent contacted Attorney Tarburton and Chancellor Chandler III, by a letter dated **June 25, 2006**, to request an extension. This extension was **approve by Attorney Tarburton, days later** and granted by Chancellor Chandler III in a new court order dated **June 27, 2006**. Also, concerning this "**Oral argument**", in this June 27, 2006, court order, Chancellor Chandler III stated, "**The hearing on June 30, 2006, is cancelled and will not be rescheduled as I intend to decide the motion to dismiss on the briefs.**" — ***The illegal use of Attorney Tarburton's deceitful June 8, 2006, letter helped to allow Chancellor Chandler III's June 9, 2006 ruling, June 20, 2006 ruling and his June 27, 2006, ruling, which stopped an just dismissal for defendant Ms. Meyers under Rule 41.(b).***

KEY part of Actionable Negligence and/or Conspiracy, which is Attorney Tarburton's deceitful letter, dated June 8, 2006. The other **KEY** part of Actionable Negligence and/or Conspiracy, is that, Attorney Tarburton's deceitful June 8, 2006, letter was **not e-filed** on June 9, 2006. Therefore, this June 8, 2006, letter was not a part of the civil case No. 1120-S' record on June 9, 2006. On June 9, 2006, in Chancellor Chandler III court order, he illegally made a ruling on this deceitful June 8, 2006, letter. This Actionable Negligence and/or Conspiracy involving both, Attorney Tarburton and Chancellor Chandler III, which is a violation of court Rule 79.1, and Administrative Directive of the Chancellor of the Court of Chancery of the State of Delaware. **Furthermore, Chancellor Chandler III, did not allow defendant Ms. Meyers any time to respond to this deceitful June 8, 2006, letter. (Note: Any reasonable man would have given defendant Ms. Meyers approximately ten (10) days to respond or to see if she will respond.)**

Conclusion -This deceitful June 8, 2006, letter allows Attorney Tarburton to **illegally and deceitfully** get his foot in the door of the " briefs " issue with the illegal help of Chancellor Chandler III, Vs. Attorney Tarburton, who failed to comply with Chancellor Chandler III's May 26, 2006, court order, which allows defendant Ms. Meyers to move for dismissal under Rule 41.(b).

Based on the facts above, this civil case No. 1120-S, has been decide by Chancellor Chandler III and Attorney Tarburton. **Therefore, Chancellor Chandler III, please do what is right, and vacate your June 9, 2006, ruling, June 20, 2006, ruling and your June 27, 2006, ruling and DISMISS this civil case No. 1120-S, under Rule 41.(b). Attorney Tarburton failed to comply with your May 26, 2006, court order by using his deceitful letter dated June 8, 2006. as pointed out in number one (1) above.**

Continue on page # 5

Chancellor Chandler III and Attorney Tarburton
July 8, 2006
Page # 5

“ Equal protection of the law. The constitutional GUARANTEE of “equal Protection of the laws“ means that no person or class of persons shall **be denied** the **same** protection of the laws which is **enjoyed by other persons** or **other classes** in **like circumstances** in their lives, liberty, **property**, and in their pursuit of happiness.”

- a. Therefore, **RESPECTFULLY -- Chancellor Chandler III**, “... in like circumstances...” **in this court**, concerning “... other persons or classes...”, do you allow ~~and/or allow~~ any attorney (officer of the court) to illegally violate Rule 79.1, and Administrative Directive of the **Chancellor** of the Court of Chancery of the State of Delaware ?
- b. **RESPECTFULLY -- Chancellor Chandler III**, in your court, do you allow a Defendant or a Plaintiff **time to see**, if they will or will not respond to a letter or document ?
- c. **RESPECTFULLY -- Chancellor Chandler III**, why have court Rules, and not apply a citizen’s constitutional **GUARANTEED**, Equal Protection of the Law, to **all** of them ?

FACTS -- For the record, in civil case No. 1120-S, Plaintiff’s Attorney, (Mr. Tarburton) violated Professional Conduct Rule 8.4, Rule 79.1, and Rule 41.(b) as detailed mentioned in this letter. Managing partner, Attorney Procino **confirmed** that she **parted way** from Attorney Tarburton as detailed mentioned in this letter. Attorney Tarburton’s client (Mr. Steven S. Krebs) became a **convicted Sex Offender** in the State of Maryland in December of 2005, and remains on Ms. Meyers property as a threat to females. Also, filed in this civil case No. 1120-S, is defendant answer to a complaint and an **MOTION TO DISMISS** Plaintiff’s AMENDED VERIFIED complaint. In defendant’s answer to a complaint Mr. Krebs has done many illegal and unfair thing on Ms. Meyers’ 2.5 acres parcel of property and to Ms. Meyers, also, see Motion to dismiss. Furthermore, Mr. Krebs and government agencies are involved in **Actionable Negligence and/or Conspiracy involving this property. Therefore, based on this letter and this paragraph, why defendant Ms. Meyers’ constitutional GUARANTEED, Equal Protection of the laws do not apply to her ?**

Actionable Negligence and/or Conspiracy involving Mr. Krebs, Mr. Krebs’ mother and the Delaware State Police, by FALSELY ARRESTING agent (Mr. Smith) TWO TIMES see below:

Chancellor Chandler III and Attorney Tarburton
July 8, 2006
Page # 6

Plaintiff, Mr. Krebs is a convicted Sex Offender in the State of Maryland , who is on Ms. Meyers 2.5 acres of real estate property. Mr. Krebs and his mother had me, (agent Mr. Smith) FALSELY ARRESTED two times, but both false arrests were **Nolle Prosequi on 04 / 27 / 2006**. The Krebs was trying to get me out of this civil case No. 1120-S. For the record, agent (Mr. Smith) have evidence that one of the false arrest was a clear frame-up, which will be very easy to prove. This false arrest was designed by frame – up to help Plaintiff, Mr. Krebs' civil case No. 1120-S. Agent, Mr. Smith did not violate any law as the evidence shows and as Mr. Krebs, Mr. Krebs mother and the Delaware State Police, also know. Therefore, **why defendant Ms. Meyers' agent's constitutional GUARANTEED, Equal Protection of the laws do not apply to him ?**

Conclusion of this letter and the just sequence of fairness below:

Step 1.---- Attorney Tarburton failed to comply with your May 26, 2006, court order by using his **deceitful letter dated June 8, 2006**, therefore, defendant Ms. Meyers move for dismissal under Rule 41.(b)

Step 2.---- Again, Chancellor Chandler III, please, vacate Step two (2), which is your June 9, 2006, ruling, June 20, 2006, ruling and your June 27, 2006, ruling, based on Attorney Tarburton's deceitful letter dated June 8, 2006, as mentioned in this letter and DISMISS this civil case No. 1120-S, under Rule 41.(b).

Take Notice to all four (4) of Chancellor Chandler III's court orders, *****Exhibit I** – May 26, 2006 order, **Exhibit J** – June 9, 2006 order, **Exhibit K** – June 20, 2006 order, and **Exhibit L** - June 27, 2006 order.

Issues listed in this letter, raise concerns for Ms. Meyers and Mr. Smith safety in many ways, and may need federal attention at this point.

Chancellor Chandler III, please DIMISS civil case 1120-S, based on reasons indicated in this letter.

Respectfully Submitted,

Pat A. Meyers
Dennis L. Smith

Patricia A. Meyers
Dennis L. Smith

Enclosed: Exhibits G, H, I, J, K, and L

CC: May be courtesy copied to any necessary agencies

Procinio, LLP - only - 7002 0460 0001 5100 2736

EXHIBIT G

Procino & Tarburton, LLP
Attorneys at Law



Michele Procino - Wells

John E. Tarburton (DE & MD)

June 27, 2006

Via facsimile and first class mail

Chancellor William B. Chandler, III
Court of Chancery
34 The Circle
Georgetown, Delaware 19947

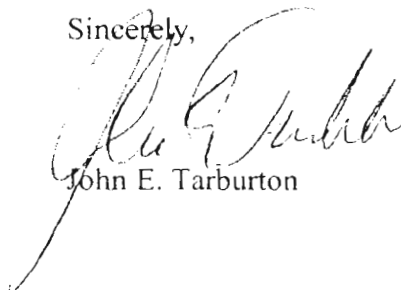
**Re: Steven Krebs d/b/a/ Kreative Gardens Center v.
Patricia A. Meyers; C.A. No. 1120-S
Defendant's request for continuance**

Dear Chancellor Chandler:

Mr. Smith contacted me on Friday, June 23, 2006, and requested a continuance for the hearing scheduled for June 30, 2006. The reason he gave was that his wife had a medical problem which would preclude him from attending. I called Mr. Smith on Monday, June 26, 2006, and told him that I had no objection to his request. The remaining assertions contained in his letter request of June 23, 2006 (and attachments) regarding any attempt by me to deceive the Court, Mr. Smith, Ms. Meyers or anyone else are denied. Apparently, my letter request for a continuance dated June 8, 2006 was not e-filed until today. I apologize for this oversight and any inconvenience it may have caused.

Please contact me if you have any questions.

Sincerely,



John E. Tarburton

JET/lkf

pc: Dennis Smith
Patricia Meyers

Exhibit A
Procino & Tarburton, LLP
Attorneys at Law

Michele Procino - Wells



John E. Tarburton (DE & MD)

June 8, 2006

Via facsimile and first class mail

Chancellor William B. Chandler, III
Court of Chancery
34 The Circle
Georgetown, Delaware 19947

**Re: Steven Krebs d/b/a/ Kreative Gardens Center v.
Patricia A. Meyers; C.A. No. 1120-S**

Dear Chancellor Chandler:

On May 26, 2006, the Court issued an Order directing an answering brief to defendant's motion to dismiss to be filed by June 9, 2006, with a reply brief due by June 25, 2006. I received this Order by mail on May 30, 2006.

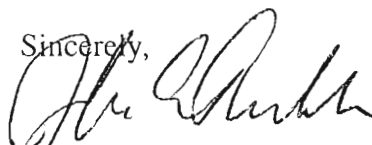
Please accept this request for an extension to file plaintiff's answering brief. It is possible for the Court to construe Defendant's motion to dismiss as:

- 1) a Motion to dismiss an amended complaint, the amendment to which has never been granted;
- 2) a Motion to dismiss the entire action, apparently under Rule 41 (b); and
- 3) a misidentified Motion for summary judgment under Rule 56.

In order to properly protect my client's interests, I believe that I need to prepare an answering brief that addresses all three possibilities. I respectfully request an extension until Friday, June 16, 2006 to file Plaintiff's answering brief.

I have been unable to contact Ms. Meyers about this request, as her phone number is unlisted. Please contact me if you have any questions.

Sincerely,



John E. Tarburton, Esquire

Pc: Patricia Meyers

123 Pennsylvania Avenue, Seaford, Delaware 19973
302.628.4140 ☎ Fax: 302.628.4150

Exhibit I

EFiled: May 26 2006 8:51AM EDT
Transaction ID 11380553



WILLIAM B. CHANDLER III
CHANCELLOR

**COURT OF CHANCERY
OF THE
STATE OF DELAWARE**

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

Submitted: May 5, 2006
Decided: May 26, 2006

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, Delaware 19973

Patricia A. Meyers
RR 4, Box 103A
Frankford, Delaware 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

Dear Mr. Tarburton and Ms. Meyers:

On February 10, 2006, defendant filed a speaking motion to dismiss the complaint. As of today, no answering brief has been filed. Briefing shall be completed as follows:

- Plaintiff shall file an answering brief by June 9, 2006.
- Defendant shall file her reply brief by June 23, 2006.

IT IS SO ORDERED.

Very truly yours,

William B. Chandler III

William B. Chandler III

WBCIII:bsr

Exhibit 7

EFiled: Jun 9 2006 12:17PM EDT
Transaction ID 11490359



**COURT OF CHANCERY
OF THE
STATE OF DELAWARE**

WILLIAM B. CHANDLER III
CHANCELLOR

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

June 9, 2006

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, DE 19973

Patricia A. Meyers
RR 4, Box 103A
Frankford, DE 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

Dear Mr. Tarburton and Ms. Meyers:

In response to Mr. Tarburton's letter of June 8, 2006, the briefing schedule, in the above-captioned case, has been revised as follows:

- Plaintiff shall file an answering brief by June 16, 2006.
- Defendant shall file her reply brief by June 30, 2006.

IT IS SO ORDERED.

Very truly yours,

William B. Chandler III

William B. Chandler III

WBCIII:meg

Exhibit A

COURT OF CHANCERY
OF THE
STATE OF DELAWARE

WILLIAM B. CHANDLER III
CHANCELLOR

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

June 20, 2006

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, DE 19973

Dennis L. Smith
P.O. Box 311
Selbyville, DE 19975

Patricia A. Meyers
RR 4, Box 103A
Frankford, DE 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

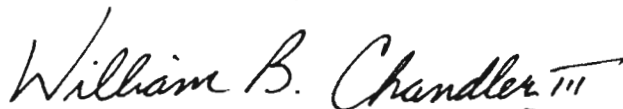
Dear Counsel, Ms. Meyers and Mr. Smith:

Pending in this matter is defendant's motion to dismiss. Oral argument in this matter shall be held on Friday, June 30, 2006 at 9:30 a.m. in the Court of Chancery, Georgetown, Delaware. In addition, I intend to use the scheduled oral argument as a form of pre-trial conference to discuss scheduling and other procedural matters in this case.

Please mark your calendars and be present on Friday, June 30, 2006 at 9:30 a.m.

IT IS SO ORDERED.

Very truly yours,



William B. Chandler III

WBCIII:meg

xc: Marsha Alfree
Arline Simmons
Court Reporters

Exhibit L

**COURT OF CHANCERY
OF THE
STATE OF DELAWARE**

WILLIAM B. CHANDLER III
CHANCELLOR

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

June 27, 2006

John E. Tarburton
Procino & Tarburton, LLP
123 Pennsylvania Avenue
Seaford, DE 19973

Dennis L. Smith
P.O. Box 311
Selbyville, DE 19975

Patricia A. Meyers
RR 4, Box 103A
Frankford, DE 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

Dear Counsel, Ms. Meyers and Mr. Smith:

In response to Mr. Smith's unopposed request, in the above-captioned case, in which he asks for an extension to file his reply brief, I have extended the date to file his reply brief to July 28, 2006. The hearing on June 30, 2006, is cancelled and will not be rescheduled as I intend to decide the motion to dismiss on the briefs.

IT IS SO ORDERED.

Very truly yours,



William B. Chandler III

WBCIII:meg

xc: Marsha Alfree
Arline Simmons
Court Reporters

Exhibit

F

The Law Office of
John E. Tarburton, Esq.
A Professional Association

*Exhibit
F*

August 25, 2006

The Honorable Kent A. Jordan
U.S. District Court
District of Delaware
Lockbox 10
844 King Street
U.S. Courthouse
Wilmington, DE 19801

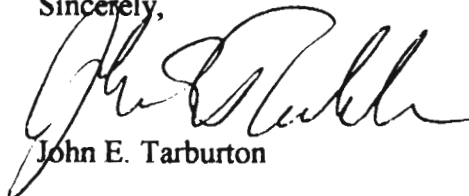
Dear Judge Jordan:

I received a letter from you dated August 16, 2006 directing me to schedule a telephone conference with your secretary to discuss dates to be adopted in a Scheduling Order. I contacted the court this morning by telephone, and am following up that call with a letter.

I am filing a Motion to Remand with the court today. The Notice of Removal which was filed with the Court on July 27, 2006, was filed by a person named Dennis Lee Smith, who is not an attorney. He was recently ordered to stop communicating with the Delaware Court of Chancery on behalf of Patricia Meyers, and filed a Notice of Removal for that reason (copy enclosed). As he is not an attorney-at-law, I don't believe that I should participate in a scheduling conference where he purports to represent the interest of Patricia Meyers.

Please contact me if you have any questions.

Sincerely,



John E. Tarburton

JET:bt

Enc.

cc Steven Krebs
Patricia Meyers ✓

FILE

To: John Tarburton
From: LexisNexis File & Serve
Subject: Notification of Transaction in Krebs, Steven et al vs Patricia A Meyers

You are being notified of an electronic submission of documents in Krebs, Steven et al vs Patricia A Meyers through LexisNexis File & Serve. The details for this transaction are listed below.

Court: DE Court of Chancery
Case Name: Krebs, Steven et al vs Patricia A Meyers
Case Number: 1120-S
Transaction ID: 11827270
Document Title(s): Letter (2 pages)
Authorized Date/Time: Jul 18 2006 2:56PM EDT
Authorizer: William B Chandler
Authorizer's Organization: DE Court of Chancery
Sending Parties: N/A

Check for additional details (and view the documents) online at:
<https://fileandserve.lexisnexis.com/Login/Login.aspx?FI=11827270> (subscriber login required)

If you are not currently a subscriber and would like to be, please visit us at <http://www.LexisNexis.com/FileAndServe> and click "Sign Up" to begin.

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<<Letter.pdf>>

COURT OF CHANCERY
OF THE
STATE OF DELAWARE

WILLIAM B. CHANDLER III
CHANCELLOR

COURT OF CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DELAWARE 19947

July 18, 2006

John E. Tarburton (Via e-Filing)
303 N. Shipley Street
Seaford, DE 19973

Dennis L. Smith (Via First Class Mail)
P.O. Box 311
Selbyville, DE 19975

Patricia A. Meyers (Via First Class Mail)
RR 4, Box 103A
Frankford, DE 19945

Re: *Steven Krebs d/b/a Kreative Garden
Center v. Patricia A. Meyers*
Civil Action No. 1120-S

Dear Ms. Meyers, Mr. Smith and Mr. Tarburton:

In light of Mr. Smith's July 8, 2006 letter to the Court, as well as Mr. Smith's numerous telephone calls to my office, I believe it is necessary for the Court to address an important procedural issue.

It is well settled under Delaware law that only a member of the Bar of the Supreme Court of Delaware, a party appearing *pro se*, or an attorney admitted *pro hac vice* may participate in a proceeding before the Court.¹ It does not appear that Mr. Smith is a member of the Delaware Bar. Mr. Smith is not a party to this lawsuit. Nor is Mr. Smith an attorney admitted *pro hac vice*. Mr. Smith represents that he is the "attorney-in-fact" for Ms. Meyers under a general power of attorney. That status, in and of itself, cannot circumvent the rules proscribing representation by non-lawyers. That is, a person holding "power of attorney," although known popularly as an "attorney-in-fact," is not considered an attorney who can appear in court on behalf of another person. The Delaware Supreme Court has recognized this critical policy in order to insure that the public will enjoy the representation of individuals who have been found to possess the

¹ *Kostyshyn v. State*, 856 A.2d 1066 (TABLE) citing *Delaware State Bar Ass'n v. Alexander*, 386 A.2d 652 (Del. 1978).

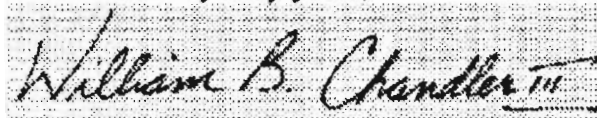
necessary skills and training to represent others.² Otherwise, anyone could, in effect, represent parties in litigation merely by acquiring a power-of-attorney.

As a result, Mr. Smith is barred from acting as an attorney representing Ms. Meyers. Instead, Ms. Meyers must either retain a licensed attorney admitted to the Bar of the Delaware Supreme Court or represent herself *pro se*.

To this end, the Court instructs the Register in Chancery to refuse any filing in this case signed by Mr. Smith acting on behalf of, or as a representative for, Ms. Meyers. In addition, the Register in Chancery and my chambers will not accept any further telephone calls from Mr. Smith pertaining to this case.

IT IS SO ORDERED.

Very truly yours,

A handwritten signature in cursive script that reads "William B. Chandler III". The signature is written in dark ink on a light-colored, slightly textured background.

William B. Chandler III

WBCIII:meg

² See *In re Snyder*, 820 A.2d 390, 392 (Del. Fam. Ct. 2001). See also *Marshall-Steele v. Nanticoke Mem'l Hosp.*, 1999 WL 458 724, at *5 (Del. Super. June 18, 1999); *Conaway v. Hawkins*, Del. Ch., C.A. No. 1942-S, Noble, V.C. (Del. Ch. May 23, 2006).